

**FILED**

AUG - 7 2018 <sup>KB</sup>

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

CHUN XU ZHANG, aka "Ray"

) No.

**18CR 476**

) Violations: Title 26, United States

) Code, Section 7206(1)

**JUDGE NORGLÉ  
MAGISTRATE JUDGE ROWLAND**

**COUNT ONE**

The SPECIAL JUNE 2018 GRAND JURY charges:

On or about May 13, 2013, in the Northern District of Illinois, Eastern  
Division,

CHUN XU ZHANG,  
aka "Ray,"

defendant herein, willfully made and subscribed, and caused to be made and  
subscribed, a U.S. Income Tax Return for Sushi City, Inc. (Form 1120S with  
schedules and attachments), for the calendar year 2012, which return was verified  
by a written declaration that it was made under penalties of perjury and was filed  
with the Internal Revenue Service, which return he did not believe to be true and  
correct as to every material matter, in that said return reported on Line 1a that  
gross receipts were \$664,584, when defendant knew that gross receipts substantially  
exceeded that amount;

In violation of Title 26, United States Code, Section 7206(1).

**COUNT TWO**

The SPECIAL JUNE 2018 GRAND JURY charges:

On or about April 30, 2014, in the Northern District of Illinois, Eastern Division,

CHUN XU ZHANG,  
aka "Ray,"

defendant herein, willfully made and subscribed, and caused to be made and subscribed, a U.S. Income Tax Return for Sushi City, Inc. (Form 1120S with schedules and attachments), for the calendar year 2013, which return was verified by a written declaration that it was made under penalties of perjury and was filed with the Internal Revenue Service, which return he did not believe to be true and correct as to every material matter, in that said return reported on Line 1a that gross receipts were \$800,887, when defendant knew that gross receipts substantially exceeded that amount;

In violation of Title 26, United States Code, Section 7206(1).

**COUNT THREE**

The SPECIAL JUNE 2018 GRAND JURY charges:

On or about June 1, 2015, in the Northern District of Illinois, Eastern Division,

CHUN XU ZHANG,  
aka "Ray,"

defendant herein, willfully made and subscribed, and caused to be made and subscribed, a U.S. Income Tax Return for Sushi City, Inc. (Form 1120S with schedules and attachments), for the calendar year 2014, which return was verified by a written declaration that it was made under penalties of perjury and was filed with the Internal Revenue Service, which return he did not believe to be true and correct as to every material matter, in that said return reported on Line 1a that gross receipts were \$945,436, when defendant knew that gross receipts substantially exceeded that amount;

In violation of Title 26, United States Code, Section 7206(1).

**COUNT FOUR**

The SPECIAL JUNE 2018 GRAND JURY charges:

On or about April 10, 2016, in the Northern District of Illinois, Eastern Division,

CHUN XU ZHANG,  
aka "Ray,"

defendant herein, willfully made and subscribed, and caused to be made and subscribed, a U.S. Income Tax Return for Sushi City, Inc. (Form 1120S with schedules and attachments), for the calendar year 2015, which return was verified by a written declaration that it was made under penalties of perjury and was filed with the Internal Revenue Service, which return he did not believe to be true and correct as to every material matter, in that said return reported on Line 1a that gross receipts were \$1,161,998, when defendant knew that gross receipts substantially exceeded that amount;

In violation of Title 26, United States Code, Section 7206(1).

A TRUE BILL:

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FOREPERSON

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UNITED STATES ATTORNEY